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and Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.)*

**IN THE UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT) ANTITRUST ) Case No. 07-5944 SC  
LITIGATION ) MDL No. 1917

This Document Relates to:

INDIRECT-PURCHASER ACTIONS

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' JOINT  
ADMINISTRATIVE MOTION TO  
SEAL DOCUMENTS PURSUANT TO  
CIVIL LOCAL RULES 7-11 AND 79-  
5(c)**

On December 17, 2012, Defendants Panasonic Corporation, Panasonic Corporation of North America, MT Picture Display Co. Ltd., Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display East, Inc.), Hitachi Asia, Ltd., Hitachi America, Ltd., Hitachi Electronic Devices (USA), Inc., LG Electronics, Inc., LG, LG Electronics USA, Inc., LG Electronics Taiwan Taipei Co., Ltd., Samsung

SDI America, Inc., Samsung SDI Co., Ltd., Samsung SDI (Malaysia) SDN. BHD., Samsung SDI Mexico S.A. DE C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co., Ltd., Tianjin Samsung SDI Co., Ltd., Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Toshiba Corporation, Toshiba America Information Systems, Inc., Toshiba America Consumer Products, L.L.C., Toshiba America Electronic Components, Inc., Koninklijke Philips Electronics N.V., and Philips Electronics North America Corporation (collectively, “Defendants”) jointly filed the following documents:

- (1) Defendants’ Opposition to Indirect-Purchaser Plaintiffs’ Motion for Class Certification and the Memorandum of Points and Authorities in Support Thereof;
- (2) Declaration of Robert D. Willig in support of Defendants’ Opposition to Indirect-Purchaser Plaintiffs’ Motion for Class Certification (“Willig Declaration”);
- (3) Exhibits 1A through 28B attached to the Willig Declaration in support of Defendants’ Opposition to Indirect-Purchaser Plaintiffs’ Motion for Class Certification;
- (4) Declaration of Eva W. Cole in support of Defendants’ Opposition to Indirect-Purchaser Plaintiffs’ Motion for Class Certification and Motion to Strike (“Cole Declaration”);
- (5) Exhibits 1 through 90 attached to the Cole Declaration in support of Defendants’ Opposition to Indirect-Purchaser Plaintiffs’ Motion for Class Certification and Motion to Strike;
- (6) Defendants’ Motion to Strike the Proposed Expert Testimony of Dr. Janet S. Netz.

With respect to these documents, Defendants also filed a Joint Administrative Motion to Seal Documents Pursuant to Civil Local Rules 7-11 and 79-5(c) (“Motion to Seal”) seeking leave to file these documents, or portions thereof, under seal.

On December 17, 2012, each Defendant filed a declaration in support of the Motion to Seal. Specifically, Defendants Panasonic Corporation, Panasonic Corporation of North America, and MT

Picture Display Co. Ltd. filed the Declaration of Eva W. Cole in Support of the Motion to Seal. Defendants Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display East, Inc.), Hitachi Asia, Ltd., Hitachi America, Ltd., and Hitachi Electronic Devices (USA), Inc. filed the Declaration of Michelle Park Chiu in Support of the Motion to Seal. Defendants LG Electronics, Inc., LG, LG Electronics USA, Inc., and LG Electronics Taiwan Taipei Co., Ltd. filed the Declaration of Hojoon Hwang in Support of the Motion to Seal. Defendants Samsung SDI America, Inc., Samsung SDI Co., Ltd., Samsung SDI (Malaysia) SDN. BHD., Samsung SDI Mexico S.A. DE C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co., Ltd. and Tianjin Samsung SDI Co., Ltd. filed the Declaration of Tyler Cunningham in Support of the Motion to Seal. Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. filed the Declaration of Courtney Byrd in Support of the Motion to Seal. Defendants Toshiba Corporation, Toshiba America Information Systems, Inc., Toshiba America Consumer Products, L.L.C., and Toshiba America Electronic Components, Inc. filed the Declaration of Lucius B. Lau in Support of the Motion to Seal. Defendants Koninklijke Philips Electronics N.V. and Philips Electronics North America Corporation filed the Declaration of Charles Malaise in Support of the Motion to Seal.

After due consideration of the papers submitted, the Court's previously entered Protective Order, and the Court's file in this matter, and good cause appearing therefore, IT IS HEREBY ORDERED THAT the Motion to Seal is GRANTED with respect to those portions of Defendants' Opposition to Indirect-Purchaser Plaintiffs' Motion for Class Certification and the Memorandum of Points and Authorities in Support Thereof, the Willig Declaration and Exhibits, and the Cole Declaration and Exhibits, and Defendants' Motion to Strike the Proposed Expert Testimony of Dr. Janet S. Netz identified by Defendants in their respective Declarations.

1. The Clerk shall place in the public record the following documents:

a. The redacted version of the Opposition to Class Certification as lodged by Defendants

1 on December 17, 2012;

2 b. The redacted version of the Willig Declaration as lodged by Defendants on December  
3 17, 2012;

4 c. The redacted versions Exhibits 1A through 28B attached to the Willig Declaration as  
5 lodged by Defendants on December 17, 2012;

6 d. The redacted version of the Cole Declaration as lodged by Defendants on December  
7 17, 2012;

8 e. The redacted versions Exhibits 1 through 90 attached to the Cole Declaration as  
9 lodged by Defendants on December 17, 2012;

10 f. The redacted version of Defendants' Motion to Strike the Proposed Expert Testimony  
11 of Dr. Janet S. Netz as lodged by Defendants on December 17, 2012.

12 All other documents filed under seal by Defendants on December 17, 2012 shall remain under seal.

13 IT IS FURTHER ORDERED that, to maintain the effect of the seal under Civil Local Rule  
14 79-5(f), the parties, their counsel, and their declarants shall not publicly disseminate or discuss any  
15 of the sealed documents or their contents absent further order of the Court.  
16

17 **IT IS SO RECOMMENDED.**  
18

19 Dated: \_\_\_\_\_

Hon. Charles A. Legge  
Special Master

20 **IT IS SO ORDERED UPON THE RECOMMENDATION OF THE SPECIAL MASTER.**  
21

22 Dated: \_\_\_\_\_

Hon. Samuel Conti  
United States District Judge